

## REMARKS

This is a full response to the outstanding final Office Action mailed January 30, 2002. Reconsideration and allowance of the application and presently pending claims 1-3, 21-29, and 31-36, as amended, are respectfully requested.

### 1. Present Status of Patent Application

Upon entry of the amendments in this response, claims 1-3, 21-29, and 31-36 remain pending in the present application. More specifically, claims 1, 23, and 35-36 are directly amended and claims 3, 5-7, 30, and 37-53 have been canceled without prejudice, waiver, or disclaimer. The foregoing amendments add no new matter to the present application.

### 2. Response to Rejection of Claims 30 and 35 Under 35 U.S.C. §112, First Paragraph

Claims 30 and 35 were rejected under 35 U.S.C. §112, First Paragraph, as allegedly containing subject matter which was not described in the specification. Accordingly, claim 30 has been canceled, and claim 35 has been amended to claim dependency to claim 31. In view of the above-described amendments, it is respectfully requested that the rejections to these claims be withdrawn.

### 3. Response to Rejection of Claims 1-3, 5, 21, 22, 24-29, 31, 32, and 33 Under 35 U.S.C. §102(e)

Claims 1-3, 5, 21, 22, 24-29, 31, 32, and 33 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by *Glenn* (U.S. Patent No. 6,143,981). In addition, claims 1 and 22 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by *Yagi* (U.S. Patent No. 6,201,292). For a proper rejection of a claim under 35 U.S.C. Section 102, the cited references

must disclose all elements and features of the claim. *See, e.g., E.I. du Pont de Nemours & Co. v. Phillips Petroleum Co.*, 849 F.2d 1430, 7 U.S.P.Q.2d 1129 (Fed. Cir. 1988). Applicants respectfully assert that this rejection has been overcome by amendment.

a. Claim 1

As provided in independent claim 1, as amended, Applicants claim:

1. A microelectronic device package comprising:
  - a die attach pad, said pad having a bottom surface;
  - a plurality of substantially flat electrical connectors formed about a perimeter of said die attach pad, wherein said connectors are configured to couple a device to a substrate;
  - a coupling of a plurality of wires from said device package to one of said connectors;*** and
  - an encapsulant surrounding a portion of said electrical connectors and a portion of said die attach pad, wherein said bottom surface of said die attach pad is substantially free of encapsulant.

(Emphasis added).

Applicants respectfully submit that independent claim 1, as amended, is allowable for at least the reason that *Glenn* does not disclose, teach, or suggest anywhere in the specification or in the figures at least the feature of “a coupling of a plurality of wires from said device package to one of said connectors” as recited in claim 1. *Glenn* is apparently limited to an electronic module whose individual contact members provide contact points for individual wires. (Col. 9, Lines 33-36). Thus, Applicants respectfully assert that *Glenn* does not anticipate independent claim 1 and request that the rejection of this claim be withdrawn.

Further, Applicants respectfully submit that independent claim 1, as amended, is allowable for at least the reason that *Yagi* does not disclose, teach, or suggest anywhere in the specification or in the figures at least the feature of “a coupling of a plurality of wires from said device package to one of said connectors” as recited in claim 1. Thus, Applicants respectfully

assert that *Yagi* does not anticipate independent claim 1 and request that the rejection of this claim be withdrawn.

b. Claim 2

Because independent claim 1 is believed to be allowable over the prior art of record, dependent claim 2 (which depends from independent claim 1) is allowable as a matter of law for at least the reason that the dependent claim 2 contains all the features and elements of independent claim 1.

c. Claims 3 and 5-7

Applicants respectfully request that claims 3 and 5-7 be cancelled without prejudice, waiver, or disclaimer. Applicants reserve the right to pursue the subject matter of canceled claims 3 and 5-7 in a continuing application, if Applicants so choose, and do not intend to dedicate any of the canceled subject matter to the public.

d. Claims 21-22, 24-29, and 31-33

Because independent claim 1 is believed to be allowable over the prior art of record, dependent claims 21-22, 24-29, and 31-33 (which depend from independent claim 1) are allowable as a matter of law for at least the reason that dependent claims 21-22, 24-29, and 31-33 contain all the features and elements of independent claim 1.

4. Response to Rejection of Claims 23, 34, and 36 Under 35 U.S.C. §103(a)

Claims 23 and 34 have been rejected under 35 U.S.C. § 103(a) as being purportedly unpatentable over *Glen*. In addition, claim 36 has been rejected under 35 U.S.C. § 103(a) as

being purportedly unpatentable over *Yagi*. It is well established at law that, for a proper rejection of a claim under 35 U.S.C. § 103 as being obvious based upon prior art, the prior art must disclose, teach, or suggest, either implicitly, all elements/features/steps of the claim at issue. *See, e.g., In re Dow Chemical*, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988); *In re Keller*, 208 U.S.P.Q.2d 871, 881 (C.C.P.A. 1981).

a. Claim 23

Because independent claim 1 is believed to be allowable over the prior art of record, dependent claim 23 (which depends from independent claim 1) is allowable as a matter of law for at least the reason that the dependent claim 23 contains all the features and elements of independent claim 1.

b. Claims 34-35

Because independent claim 31 is believed to be allowable over the prior art of record, dependent claims 34-35 (which depend from independent claim 31) are allowable as a matter of law for at least the reason that the dependent claims 34-35 contain all the features and elements of independent claim 31.

c. Claim 36


Because independent claim 1 is believed to be allowable over the prior art of record, dependent claim 36 (which depends from independent claim 1) is allowable as a matter of law for at least the reason that the dependent claim 36 contains all the features and elements of independent claim 1.

**CONCLUSION**

For at least the foregoing reasons, all rejections and objections have been rendered moot, accommodated, and/or traversed, and Applicants respectfully request that all outstanding rejections be withdrawn and that all pending claims 1-3, 21-29, and 31-36 of this application be allowed to issue. If the Examiner has any comments regarding Applicants' response or intends to dispose of this matter in a manner other than a notice of allowance, Applicants request that the Examiner telephone Applicants' undersigned agent.

Respectfully submitted,

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## ANNOTATED VERSION OF MODIFIED CLAIMS TO SHOW CHANGES MADE

The following is a marked up version of the amended claims, wherein brackets denoted deletions and underlining denotes additions.

1. (Thrice Amended) A microelectronic device package comprising:  
a die attach pad, said pad having a bottom surface;  
a plurality of substantially flat electrical connectors formed about a perimeter of said die attach pad, wherein said connectors are configured to couple a device to a substrate;  
a coupling of a plurality of wires from said device package to one of said connectors;  
and  
an encapsulant surrounding a portion of said electrical connectors and a portion of said die attach pad, wherein said bottom surface of said die attach pad is substantially free of encapsulant.

23. (Once Amended) The microelectronic device package according to claim [5] 1, wherein said wire is formed of gold wire having a diameter of approximately 25 microns.

35. (Once Amended) The microelectronic device package according to claim [30] 31, wherein said frame is coated with about 10 micro inches of palladium.

36. (Once Amended) The microelectronic device package according to claim 22, wherein said device is bonded to said pad using conductive epoxy.